

FILED
U.S. DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

NATIONAL CAPITAL ADMINISTRATIVE SERVICES)
Plaintiff)
v.) Case No. L-01-CV4191
CARMEN PINKERT)
Defendant)

JOINT MOTION TO REQUEST EARLY
SETTLEMENT/ADR CONFERENCE AND POSTPONE DISCOVERY

COMES NOW the Plaintiff, National Capital Administrative Services and the Defendant, Carmen Pinkert, in this matter, by and through their counsel, and make this Joint Motion to Request Early Settlement/ADR Conference and Postpone Discovery.

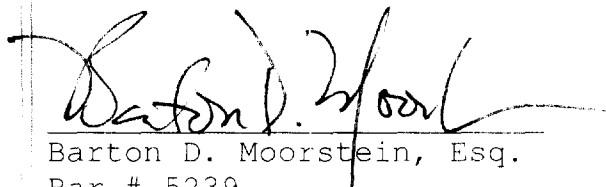
Furthermore, pending mediation, the parties agree to, and request this Court to allow, postponement of discovery for sixty (60) days. In the event that the parties do not settle their dispute in ADR, there is unanimous consent to proceed before a United States Magistrate Judge.

WHEREFORE, the parties wish to stay discovery in this matter for sixty (60) days in order to mutually attempt resolution of the same.

23rd
APPROVED THIS 23 DAY OF Sep. 2002
Benson Everett Legg
BENSON EVERETT LEGG, U.S.D.J.

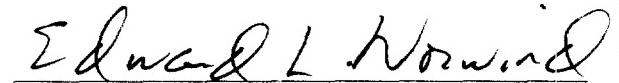

RESPECTFULLY SUBMITTED,

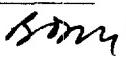
BLANK & MOORSTEIN, L.L.P.



Barton D. Moorstein, Esq.
Bar # 5239
600 Jefferson Plaza, #202
Rockville, Maryland 20852
301-279-2200
Attorney for Plaintiff

KARP, FROSH, LAPIDUS, WIGODSKY
& NORWIND, P.A.



Edward L. Norwind, Esq. 
Bar # 08858
1370 Piccard Drive, #290
Rockville, Maryland 20850
301-948-3800
Attorney for Defendant

Dated: September 19, 2002

LAW OFFICES
BLANK & MOORSTEIN, L.L.P.
SUITE 202
600 JEFFERSON PLAZA
ROCKVILLE, MARYLAND 20852

ARNOLD BLANK
BARTON D. MOORSTEIN
STUART LIPSHUTZ

(301) 279-2200
FAX: (301) 279-7138

D.C. OFFICE
SUITE 710
1225 19TH STREET, N.W.
WASHINGTON, D.C. 20036

September 19, 2002

BY HAND

Honorable Benson Everett Legg
U.S. District Court for
the District of Maryland
101 West Lombard Street, 4th Floor
Baltimore, Maryland 21201

Re: National Capital Administrative
Services v. Carmen D. Pinkert
Case No. L01CV4191

Dear Judge Legg:

Pursuant to the Scheduling Order entered in this matter on September 6, 2002, the parties report to you as follows:

- 1) The parties believe that the Deposition hours for each side will not exceed ten (10) hours each;
- 2) The parties unanimously consent to proceed before a United States Magistrate Judge.

Contemporaneously, the parties have also filed a Joint Motion to Request Early Settlement/ADR Conference and Postpone Discovery, with a mediator to be chosen by the parties. Pending mediation, the parties have also requested that discovery be postponed.

If you should have any questions regarding the enclosed, please do not hesitate to call undersigned counsel.


Very truly yours,
Barton D. Moorstein

BDM/lac
Enc: as stated